ExxonMobil Refining & Supply Company

Global Remediation

601 Jefferson Street Room 1225 Houston, TX 77002

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STEVEN P. SCHMIDT



RECEIVED

AUG 2 2 2001

PAP INVINFO SECTION

August 21, 2001

Lower Darby Creek Area Site Delaware and Philadelphia Co., PA

Ms. Carlyn Winter Prisk (3HS11)
U. S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Overnight Mail

Dear Ms. Prisk:

Attached is ExxonMobil's response to your recent request for information. It is possible that we will supplement this response with additional information.

You may reach me at (713)-656-9074 if you have questions.

Sincerely,

Steven P. Schmidt

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Attachments

QUESTIONS



1. State the name of your company, its mailing address, and telephone number. Further identify:

Exxon Mobil Corporation. The address is 601 Jefferson Street, Room 1225, Houston, TX 77002. Phone: (713)-656-9074.

- a. The dates and states of incorporation of your company;
- b. The date and original state of incorporation of your company; and

Exxon Mobil Corporation is a New Jersey corporation with a date of incorporation of August 5, 1882.

c. The parent corporation of your company, if any, and all subsidiaries or other affiliated entities.

The parent is Exxon Mobil Corporation. The information requested, while it may be appropriate for a closely held corporation makes no sense for an ExxonMobil. Exxon Mobil Corporation and its predecessors have had interests in hundreds if not thousands of companies. If there are some of particular interest, we will supply the requested information.

2. What is the current nature of the business or activity conducted at your establishment(s) in the Philadelphia, Pennsylvania area? What was the nature of your business or activity between 1958 and 1976? Please describe in detail. If the nature of your business or activity changed from the period of 1958 to 1976 to the present, please provide a detailed explanation of the changes to date.

The meaning of the phrase "the Philadelphia, Pennsylvania area" was provided by Ms. Carlyn Winter Prisk of USEPA Region III as including the five-county area surrounding the city of Philadelphia, including south New Jersey. Further, Ms. Prisk said to exclude service stations from the scope of this request.

Exxon Mobil Corporation currently owns, operates and/or leases a number of service stations in the Philadelphia, Pennsylvania area. Exxon Mobil Corporation also operates a research and engineering laboratory, lubricant packaging plant and distribution terminal in Paulsboro, New Jersey.

Between 1958 and 1976 the Mobil Oil Company operated an oil refinery in Paulsboro, New Jersey. The refinery was sold to Valero Energy Corporation of San Antonio, TX in 1998.



3. Identify all persons currently or formerly employed by your establishment(s) who have or may have personal knowledge of your operations and waste disposal practices between 1958 and 1976 at your facilities in the Philadelphia, Pennsylvania area. For each such person, state that person's employer, job title, dates of employment, current address, and telephone number. If the current telephone number or address is not available, provide the last known telephone number or last known address of such person.

No such persons have been identified to date.

- 4. Identify the owners and operators of your establishment(s) in the Philadelphia, Pennsylvania area from 1958 to the present. For each owner and operator further provide:
 - a. The dates of their operation;
 - b. The nature of their operation; and

Mobil Oil Company was the owner and operator of the Paulsboro oil refinery from 1958 until the sale of assets to Valero Energy Corporation in 1998. Valero is the current owner and operator of the Paulsboro oil refinery. Currently, Exxon Mobil Corporation owns and operates the laboratory, lube packaging plant and terminal in Paulsboro, New Jersey.

c. All information or documents relating to the handling and/or generation, storage, treatment, recycling, formulation, disposal, or transportation of any hazardous substance, hazardous waste, pollutant, contaminant, or other waste during the period in which they were operating the establishment(s).

ExxonMobil objects to the broad scope of this question. No information responsive to this request has been located to date.

- 5. Describe the types of documents generated or maintained by your establishment(s) in the Philadelphia, Pennsylvania area concerning the handling and/or generation, storage, treatment, transportation, recycling, formulation, or disposal of any hazardous substance, hazardous waste, pollutant, contaminant or other waste between 1958 and 1976.
 - a. Provide a description of the information included in each type of document and identify the person who was/is the custodian of the documents:



One record LDCA001-002 was located which lists a transporter who hauled material from the Paulsboro Refinery. I have attached this record for your review

- b. Describe any permits or permit applications any correspondence between your company and/or establishment(s), and any regulatory agencies regarding the transportation and disposal of such wastes; and
- c. Describe any contracts or correspondence between your company and/or establishment(s) and any other company or entity regarding the transportation and disposal of such wastes.

No information responsive to this request has been located to date.

- 6. Identify every hazardous substance used, generated, purchased, stored, or otherwise handled at your establishment(s) in the Philadelphia, Pennsylvania area between 1958 and 1976. Provide chemical analyses and Material Safety Data Sheets ("MSDS"). With respect to each such hazardous substance, further identify:
 - a. The process(es) in which each hazardous substance was used, generated, purchased, stored, or otherwise handled;
 - b. The chemical composition, characteristics, and physical state (solid, liquid, or gas) of each such hazardous substance:
 - c. The annual quantity of each such hazardous substance used, generated, purchased, stored, or otherwise handled;
 - d. The beginning and ending dates of the period(s) during which such hazardous substance was used, generated, purchased, stored, or otherwise handled;
 - e. The types and sizes of containers in which these substances were transported and stored; and
 - f. The persons or companies that supplied each such hazardous substance to your company.

Exxon Mobil Corporation objects to this question, as it is overly broad given the extent of ExxonMobil's operations. If there are specific transactions of interest, please provide us the details of those transactions.

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Without waiving this objection, we respond that ExxonMobil is an integrated oil company with operations including sales of various petroleum products as well as petroleum based chemical products. The facilities identified in Question 2 manufactured or transported crude oil fractions exempt as hazardous substances under CERCLA and RCRA.

- 7. Identify all by-products and wastes generated, stored, transported, treated, disposed of, released, or otherwise handled by your establishment(s) in the Philadelphia, Pennsylvania area between 1958 and 1976. With respect to each such by-product and waste identified, further provide:
 - a. The process(es) in which each such by-product and waste was generated, stored, transported, treated, disposed of, released, or otherwise handled;
 - b. The chemical composition, characteristics, and physical state (solid, liquid, or gas) of each such by-product or waste;
 - c. The annual quantities of each such by-product and waste generated, stored, transported, treated, disposed of, released, or otherwise handled;
 - d. The types, sizes, and numbers of containers used to treat, store, or dispose of each such by-product or waste;
 - e. The name of the individual(s) and/or company(ies) that disposed of or treated each such by-product or waste; and
 - f. The location and method of treatment and/or disposal of each such by-product or waste.

No information responsive to this request has been located to date.

- 8. Did your company ever contract with, or make arrangements with Clearview, Folcroft, Folcroft Annex, Eastern Industrial, Tri-County Hauling, S. Buckly Trash Hauling, Barratt Rupurt, McCloskey Engineering, Marvin Jonas, Jonas Waste Removal, Schiavo Bros., Inc., ADM Disposal Services and/or any other company or municipality to remove or transport material from your establishment(s) in the Philadelphia, Pennsylvania area between 1958 and 1976 for disposal? If so, for each transaction identified above, please identify:
 - a. The person with whom you made such a contract or arrangement;

- b. The date(s) on which or time period during which material was removed or transported for disposal;
- c. The nature of such material, including the chemical content, characteristics, and physical state (i.e., liquid, solid, or gas);
- d. The annual quantity (number of loads, gallons, drums) of such material;
- e. The manner in which such material was containerized for shipment or disposal;
- f. The location to which such material was transported for disposal;
- g. The person(s) who selected the location to which such material was transported for disposal;
- h. The individuals employed with any transporter identified (including truck drivers, dispatchers, managers, etc.) with whom your establishment dealt concerning removal or transportation of such material; and
- i. Any billing information and documents (invoices, trip tickets, manifests, etc.) in your possession regarding arrangements made to remove or transport such material.

No relationship with the companies listed above or a municipality, to remove or transport material for disposal between 1958 and 1976, has been indicated by our review of internal information to date.

- 9. Provide the names, titles, areas of responsibility, addresses, and telephone numbers of all persons who, between 1958 and 1976, may have:
 - a. Disposed of or treated materials at Clearview, Folcroft and Folcroft Annex or other areas of the Site;
 - b. Arranged for the disposal or treatment of materials at Clearview, Folcroft and Folcroft Annex or other areas of the Site; and/or
 - c. Arranged for the transportation of materials to Clearview, Folcroft and Folcroft Annex or other areas of the Site (either

directly or through transshipment points) for disposal or treatment.



No such people or entities with knowledge of transportation of materials to these sites have been identified to date.

- 10. For every instance in which your establishment(s) disposed of or treated material at Clearview, Folcroft and Folcroft Annex or other areas of the Site, or arranged for the disposal or treatment of material at the Site, identify:
 - a. The date(s) on which such material was disposed of or treated at the Site;
 - b. The nature of such material, including the chemical content, characteristics, and physical state (i.e., liquid, solid, or gas);
 - c. The annual quantity (number of loads, gallons, drums) of such material;
 - d. The specific location on the Site where such material was disposed of or treated; and
 - e. Any billing information and documents (invoices, trip tickets, manifests, etc.) in your company's or establishment's(s') possession regarding arrangements made to dispose of or treat such material at the Site.

Not applicable.

- 11. Did your establishment(s), or any other company or individual ever spill or cause a release of any chemicals, hazardous substances, and/or hazardous waste, and/or non-hazardous solid waste on any portion of Clearview, Folcroft and Folcroft Annex or any other portion of the Site? If so, identify the following:
 - a. The date(s) the spill(s) release(s) occurred;
 - b. The composition (i.e., chemical analysis) of the materials which were spilled/released;
 - c. The response made by you or on your behalf with respect to the spill(s)/release(s); and
 - d. The packaging, transportation, and final disposition of the materials which were spilled/released.

Not applicable.

12. Please identify individuals employed by your establishment(s) who were responsible for arranging for the removal and disposal of wastes, and individuals who were responsible for payments, payment approvals, and record keeping concerning such waste removal transactions at your Philadelphia, Pennsylvania area establishment(s) between 1958 and 1976. Provide current or last known addresses and telephone numbers where they may be reached. If these individuals are the same persons identified by your answer to question 3, so indicate.

No such persons have been identified.

13. Did you or any person or entity on your behalf ever conduct any environmental assessments or investigations relating to contamination at Clearview, Folcroft and Folcroft Annex or any other areas of the Site? If so, please provide all documents pertaining to such assessments or investigations.

No information responsive to this request has been located to date.

14. If you have any information about other parties who may have information which may assist the EPA in its investigation of the Site, including Clearview, Folcroft and Folcroft Annex, or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information you provide in response to this request should include the party's name, address, telephone umber, type of business, and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.

No such persons have been identified.

- 15. Representative of your establishment(s):
 - Identify the person(s) answering these questions on behalf of your establishment(s), including full name, mailing address, business telephone number, and relationship to the company.
 - b. Provide the name, title, current address, and telephone number of the individual representing your establishment(s) to whom future correspondence or telephone calls should be directed.



These responses were prepared by Steven P. Schmidt. Mr. Schmidt is a Superfund Consultant for Exxon Mobil Corporation. His contact information is:

Steven P. Schmidt 601 Jefferson Street Room 1225 Houston, TX 77002

Phone: (713)-656-9074 Fax: (713)-656-9030

Email: steven.p.schmidt@exxonmobil.com

- 16. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following:
 - a. Your document retention policy;
 - b. A description of how the records were/are destroyed (burned, archived, trashed, etc.) and the approximate date of destruction:

In 1997, there was a casualty fire loss of boxes of documents that included a file called Tinicum Marsh Site.

- c. A description of the type of information that would have been contained in the documents; and
- d. The name, job title, and most current address known to you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.

Exxon Mobil Corporation has no knowledge that any relevant documents solicited in this information request are, or ever were, available.

No such persons have been identified.

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ATTACHHENT I

RECORDS SEARCH

The following is the result of all information known and available of all transporters who hauled material from the Paulsboro Refinery up to 12/31/80. Note: No records are known to exist or were found with information prior to 1975.

YEAR	FACILITY NAME	TRANSPORTER	WASTE	QUANTITY
1975	Paulsboro Refinery	Robert T. Winzinger, Inc.	11	Unknown

This redacted area contains information outside the scope of the Required Submission of Information.

WWMcCoy 10/31/88

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ATTACHMENT RECORDS SEARUM

The following is the result of all information known and available of all transporters who hauled material for the Paulsboro Refinery up to 12/31/80. Note: No records are known to exist or were found with information prior to 1975.

YEAR_	TRANSPORTER	DISPOSAL FACILITY	WASTE Code QUANTITY
1975	Robert T. Winzinger, Inc.	Mackland Landfill, Deptford	Oily sludge, Unknown Coke fines and // oily sand (Old Pond)

This redacted area contains information outside the scope of the Required Submission of Information.

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